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May 25, 2022

Hon. P. Kevin Castel, U.S.D.J.
United States District Court for the
Southern District of New York
500 Pearl Street, Courtroom 11D
New York, New York 10007

Re: *Neuman v. Garcia, et al., Case No. 1:20-cv-10723-PKC*

Dear Judge Castel:

This is Plaintiff Phil Neuman's letter motion to allow the filing of his Reply Memorandum [105] in further support of his Motion for Reconsideration to be filed one minute late. Defendants have graciously consented.

The Reply Memorandum was due on Tuesday, May 24, 2022. I have been on a delayed-due-to-COVID vacation to Belize and Guatemala since May 20, 2022. Defendants did not consent to extend the briefing schedule to accommodate my vacation, but I was nevertheless able to prepare the Reply Memorandum while on vacation. On May 24, 2022, however, I drove from Belize to Guatemala and experienced unexpected delays at the border. I arrived at my hotel in the Peten rainforest after 9:00 pm Guatemala time, which was after 11:00 pm New York time.

By the time I was able to connect to the hotel Wi-Fi, it was close to midnight EDT. I filed the Reply Memorandum a few seconds after midnight, so the Reply Memorandum was technically filed on May 25, 2022, a few seconds after the due date of May 24, 2022.

Neuman therefore requests under Fed. R. Civ. P. 6(b)(1)(B) that the late filing be allowed for good cause and excusable neglect.

Thank you for considering this matter.

Sincerely,

/s/ Edward Griffith

Edward Griffith

EG:gb

cc: James H. Hulme, Esq. (via email; w/o enclosure)
Jule Rousseau, Esq. (via email; w/o enclosure)